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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

William Christopher Carmody
(admitted *pro hac vice*)
Shawn J. Rabin (admitted *pro hac vice*)
Steven M. Shepard (admitted *pro hac vice*)
Alexander P. Frawley
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Case No.: 3:20-cv-04688

**ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF CUSTODIAN JOINT
LETTER BRIEF**

The Honorable Alex G. Tse
Courtroom A – 15th Floor
Trial Date: Not Yet Set

Pursuant to Civil Local Rules 7-11 and 79-5, Plaintiffs respectfully seek to seal portions of the parties' Joint Letter Brief Regarding Plaintiffs' Request for Google to Search Additional Custodians' ESI ("Custodian Joint Letter Brief"), which refers to and contains material designated by Google as "Confidential" or "Highly Confidential – Attorneys' Eyes Only."

This motion to seal pertains to the following information.

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Custodian Joint Letter Brief	Google	Portions highlighted in Yellow on Pages 1-2.	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order

Pursuant to Civil Local Rule 79-5(e), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: November 1, 2021

Respectfully submitted,

By: /s/ Amanda Bonn

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